

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
<i>Plaintiff,</i>)	
)	Case No. 08 CR 398-6
v.)	
)	Honorable Martin Ashman,
VASILE FOFIU,)	<i>Judge Presiding</i>
<i>Defendant.</i>)	

UNOPPOSED MOTION FOR PERMISSION TO TRAVEL

The defendant, VASILE FOFIU, by counsel, THOMAS M. BREEN and SUSAN M. PAVLOW, pursuant to Title 18, United States Code §3142(c), respectfully moves this Court to modify the conditions of his bond to allow him to travel to Wisconsin on July 4, 2008. The following is offered in support of this motion.

1. The criminal complaint charges the defendant with conspiracy to commit bribery in violation of Title 18, United States Code, Section 371. The defendant was released on bond and is presently monitored by pretrial services.

2. The defendant seeks permission to travel to Bristol, Wisconsin, for the day of July 4, 2008. Mr. Fofiu would check with his pretrial officer prior to leaving and upon return, as well as comply with any other conditions the pretrial office deems necessary.

3. As such, the defendant seeks to modify the conditions of his release to allow him to travel to Wisconsin on July 4, 2008.

4. Counsel for defendant has spoken with Assistant United State's Attorney Juliet Sorensen, who has no objection to the defendant's request.

5. In addition, counsel for defendant has spoken with United States Pretrial Officer James Wheatley, who also has no objection to the defendant's request.

WHEREFORE Defendant Fofiu respectfully requests the Court to enter an order granting him permission to travel to Wisconsin on July 4, 2008, and for any other relief the Court deems just and proper.

/s/ Susan M. Pavlow
Attorney for Vasile Fofiu

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CERTIFICATE OF SERVICE

I hereby certify that the Unopposed Motion for Permission to Travel was served this 27th day of June, 2008, in accordance with Fed.R.Crim.P. 49, Fed.R.Civ.P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

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